

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

PETRO INDUSTRIAL SOLUTIONS, LLC  
(PETRO),

Plaintiff,

vs.

ISLAND PROJECT AND OPERATING  
SERVICES, LLC, VITOL US HOLDING II  
CO., VITOL VIRGIN ISLANDS CORP,  
ANDREW CANNING and OPTIS  
EUROPE, LTD.,

Defendants.

CASE NO. 1:21-CV-00312

**BREACH OF CONTRACT**

JURY TRIAL DEMANDED

**NOTICE OF CROSS 30(B)(6) DEPOSITION OF VERSA INTEGRITY GROUP, INC.**

TO: Glenda L. Lake, Clerk of the Court  
District Court of the V.I.

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**PLEASE TAKE NOTICE** that pursuant to Federal Rule of Civil Procedure 30(b)(6), Plaintiff **PETRO INDUSTRIAL SOLUTIONS, LLC**, by and through undersigned counsel, will take the oral examination of **VERSA INTEGRITY GROUP, INC.** Defendant shall designate one or more officers, directors or managing agents who are competent to testify on the company's behalf.

That person(s) who is designated to testify on Defendant's behalf should have knowledge of, but not be limited to, the following:

1. The contractual relationship between the Plaintiff and Versa Integrity Group, Inc.
2. Versa Integrity Group's knowledge as to how to certify welders.
3. Versa Integrity Group's knowledge as to how to recertify welders who have been previously certified and continued to work for a company.
4. ASME requirements as to listing welders.
5. The scope and results of Versa Integrity Group's listing of Petro's work on the 3" vent line at the Vitol Propane Terminal as hired by Petro.
6. The request by IPOS, VTTI, or Vitol to retest the Petro welds, the scope of that listing, the results, and whether the welds as a whole passed the ASME standards for

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approval of the work.

7. Who hired Versa Integrity Group to test the WPA 3" Rent Line welds after Petro had Versa test them, the amount billed, who were the primary persons reported to, and the cost of the work?

8. Who actually was in charge of the work for Versa Integrity Group on the second contract to list the 3" vent line?

9. Versa Integrity Group's knowledge of Guillermo Castro.

Join Zoom Meeting

<https://us02web.zoom.us/j/85485690947?pwd=RkFkb0VUWVYVid00xeU9UWklabXpnUT09>

Meeting ID: 854 8569 0947

Passcode: 245863

This deposition will take place on **June 22, 2023, at 2:00 PM**, at **via Zoom**, before any Notary Public commissioned by the Territory of the US Virgin Islands or other person qualified to administer the oath and take deposition.

This deposition is being taken for use as evidence and/or trial purposes and may be continued from day to day until completed.

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RESPECTFULLY SUBMITTED  
LEE J. ROHN AND ASSOCIATES, LLC  
Attorneys for Plaintiff

DATED: June 16, 2023

BY: /s/ Lee J. Rohn  
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**CERTIFICATE OF SERVICE**

**THIS IS TO CERTIFY** that on June 16, 2023, I electronically filed the foregoing with the Clerk of the Court using the electronic filing system, which will send a notification of such filing to the following:

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I also caused a true and correct copy of the foregoing to be served via electronic mail upon the following:

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BY: /s/ Lee J. Rohm (kj)